

***Remarks***

Reconsideration of this application is respectfully requested.

Claims 1, 2, 4-6, 9-14, and 17-27 are pending in the application, with claims 1 and 23 being the independent claims.

Based on the following remarks, Applicant respectfully requests that the Examiner reconsider all outstanding rejections and that they be withdrawn.

***Rejections under 35 U.S.C. § 112***

Claims 1, 2, 4-6, 9-14, and 17-27 were rejected under 35 U.S.C. § 112, first paragraph as allegedly failing to comply with enablement requirement. The Examiner asserts that the specification does not adequately define the operation of the screw mechanism as now claimed. The Examiner states that the specification does not describe how the shafts 25 and 27 and the actuator 21 move with respect to each other to raise the platform, and requires "a detailed explanation of how and when these elements rotate and are fixed with respect to each other in order to raise the platform as claimed is needed."

Applicant respectfully submits that at least Figures 2-4 and paragraph 3 at page 13, lines 7-18, of the present specification (amended on February 22, 2010) support the present claims. The specification states, "axial movement of the platform is effected by **a worm drive screw mechanism** 19 (shown more clearly in FIG. 4). This comprises a two-piece shaft 25, 27 and actuator 21. The two sections of the shaft are screwed together by **respective internal and external threads** on shafts 27 and 25. Shaft 25 is fixed to underside 11b of the platform 11. Shaft 27 is fixed to actuator 21 by a screw fastened **in an opposite direction from that joining shafts 25 and 27.**" The mechanics

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of worm drives are well known. As shown in Figure 3, the direction of the external threads on shaft 25 is opposite the direction of the external threads on shaft 27. As such, rotation of actuator 21 (functioning like a worm wheel) drives shaft 27 to raise and rotate by virtue of the external threads on shaft 27 (functioning like a worm). Rotation of shaft 27 in turn unthreads from shaft 25 by virtue of the opposite direction of external threads on shaft 25 and simultaneously raises shaft 25 (and platform 11) without rotating. Once shaft 27 is in its upper most position, shaft 25 is also in its upmost position, as shown in Figure 3.

For at least the foregoing reasons, Applicant respectfully submits that the present specification adequately defines the operation of the screw mechanism as claimed. Also, the Examiner left a telephone message on January 11, 2011, in response to a telephone call from the Applicant's representative, Anbar Khal, to discuss this rejection. In the message, the Examiner recognized that a worm screw mechanism is well known, and indicated that providing a brief explanation of the mechanics of the screw mechanism in this Reply should suffice for responding to the rejection. Applicant has provided such an explanation above. Applicant therefore respectfully requests the rejection be reconsidered and withdrawn.

***Allowable Subject Matter***

Claims 1, 2, 4-6, 9-14, and 17-27 would be allowable upon the specification being amended to overcome the enablement rejection. For at least the reasons discussed above, Applicant respectfully requests the enablement rejection be withdrawn, and respectfully requests allowance of claims 1, 2, 4-6, 9-14, and 17-27.

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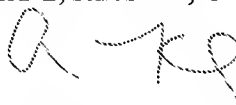
***Conclusion***

All of the stated grounds of rejection have been properly traversed, accommodated, or rendered moot. Applicant therefore respectfully requests that the Examiner reconsider all presently outstanding rejections and that they be withdrawn. Applicant believes that a full and complete reply has been made to the outstanding Office Action and, as such, the present application is in condition for allowance. If the Examiner believes, for any reason, that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at the number provided.

Prompt and favorable consideration of this Amendment and Reply is respectfully requested.

Respectfully submitted,

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